

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BOARHEAD FARM AGREEMENT GROUP,	:	
	:	
Plaintiff,	:	CIVIL ACTION
	:	
v.	:	NO. 02-3830
	:	
ADVANCED ENVIRONMENTAL TECHNOLOGY CORPORATION,	:	
ET. AL.	:	
	:	
Defendants.	:	

MOTION FOR LEAVE TO FILE REPLY BRIEF

Plaintiff Boarhead Farm Agreement Group (“Plaintiff”), by its undersigned counsel, hereby moves for leave to file a reply memorandum in support of its motion for Standing Order to establish a procedure for entry of orders barring any future claims against any Defendant that settles in good faith with Plaintiff. In support of this motion, Plaintiff avers as follows:

1. On December 15, 2003 Plaintiff filed a Motion For Standing Order Regarding Dismissal of Settling Defendants (“the Motion”). The Motion seeks to establish a procedure for entry of orders barring any future claims against any Defendant that settles in good faith with Plaintiff.
2. On or about January 5, 2004 this Court extended the time by which opposition to the Motion need be filed until January 30, 2004.
3. On January 29 and 30, 2004 two opposition submissions were filed.

4. Pursuant to Local Rule 7.1(c), Plaintiff seeks leave to file a short reply memorandum, a copy of which is submitted herewith, to set the record straight as to the nature of the dismissal process sought in the Motion, and to respond to certain of the arguments made in the opposition submissions.

5. Plaintiff believes that this reply memorandum will significantly aid the Court in ruling on the Motion.

6. Pursuant to Local Rule 7.1(f), Plaintiff requests oral argument.

WHEREFORE, Plaintiff respectfully requests this Honorable Court to consider the attached reply memorandum, and to consider the memorandum filed as of the date of this motion.

Dated: February 5, 2004

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